**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Global Interactive Media, Inc.,	Case No.
Plaintiff,	
v.	Judge:
	Magistrate Judge:
REELZCHANNEL, LLC	**JURY TRIAL DEMANDED**
Defendant.	

COMPLAINT FOR PATENT INFRINGEMENT

Global Interactive Media, Inc. ("Global Interactive") brings this patent-infringement action against REELZCHANNEL, LLC ("REELZ").

Parties

1.   Global Interactive is a Belizian company based in Belize.

2.   REELZ is a limited liability company organized under the laws of Delaware, with its principal place of business located in Albuquerque, New Mexico.

Jurisdiction and Venue

3.   This action arises under the patent laws of the United States, 35 U.S.C. §§ 101 *et seq*.

4.   This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).

5.   This Court may exercise personal jurisdiction over REELZ. REELZ conducts continuous and systematic business in Illinois and this District. REELZ maintains corporate offices in this District. This patent-infringement case arises directly

from REELZ's continuous and systematic activity in this District. In short, this Court's exercise of jurisdiction over REELZ would be consistent with the Illinois long-arm statute, 735 ILCS § 5/2-209, and traditional notions of fair play and substantial justice.

6.   Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b)(2) and 1400(b).

Count 1 – Infringement of U.S. Patent No. 8,032,907

7.   Global Interactive owns United States Patent 8,032,907 (the "'907 patent") (attached as Exhibit A).

8.   REELZ is infringing at least one of the 90 methods and systems claimed in the '907 patent by providing the REELZ Schedule service.

9.   For example, and for illustration of one of the 90 claims of the '907 patent that Global Interactive alleges the REELZ Schedule service infringes, the service infringes claim 18 of the '907 patent as follows:

  a. Claim 18 is a method of "broadcasting program material in at least one broadcast . . . ." (Ex. A, 19:16.) The REELZ Schedule service contains listings of television programs that are broadcasted to consumers. http://www.reelz.com/reelztv/.

  b. Claim 18 is a method of "receiving one or more user inquiries from one or more recipients of said at least one broadcast, said one or more inquiries including broadcast identifier information . . . ." (Ex. A, 19:17-19.) A consumer using the REELZ Schedule service may access the service's website and inquire about, for example, the "Treasure King & Scream

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Queen" episode of the television show *Treasure King* broadcasted by REELZ.

c. The method of claim 18 involves "creating a program description file comprising program information related to program material to be broadcast in the future . . . ." (Ex. A, 19:20-22.) The individual inquiring about the episode "Treasure King & Scream Queen" would learn from the REELZ Schedule service: "Richie tries to scare up an item from an iconic horror film. Will it be a dream come true - or turn into a nightmare?" http://www.reelz.com/treasureking/.

d. Next, claim 18 involves "communicating the program information into a programmed data processor . . . ." (Ex. A, 19:23-24.) The REELZ Schedule service user is able to learn about REELZ's *Treasure King* because REELZ has a programmed data processor that communicates the program information to the REELZ Schedule service.

e. Claim 18 involves "synchronizing said communicated program information with said program material of said at least one broadcast. . . ." (Ex. A, 19:25-26.) REELZ synchronizes the *Treasure King* program information with the broadcast of the *Treasure King* program.

f. Claim 18 involves "using said data programmed data processor to communicate, to the one or more recipients, program information that corresponds to the broadcast identifier information included in said one or more inquiries, wherein at least one of the program description file, the program information, and the synchronized program information is

associated with the broadcast identifier information." (Ex. A, 19:28-35.) The REELZ Schedule service communicates the *Treasure King* program information to the REELZ Schedule service user.

Count 2 – Infringement of U.S. Patent No. 6,314,577

10.   Global Interactive owns United States Patent 6,314,577 (the "'577 patent") (attached as Exhibit B).

11.   REELZ is infringing at least one of the 130 methods and systems claimed in the '577 patent by providing the REELZ Schedule service.

12.   For example, and for illustration of one of the 130 claims of the '577 patent that Global Interactive alleges the REELZ Schedule service infringes, the service infringes claim 94 of the '577 patent as follows:

a. Claim 94 is a "method for providing listeners or viewers of a radio or television broadcast with automated information about program material, comprising the steps of: broadcasting at least one radio or television broadcast . . . ." (Ex. B, 23:14-1.8.) The REELZ Schedule service website contains listings of television programs that are broadcasted to consumers. http://www.reelz.com/reelztv/.

b. Claim 94 involves "receiving user inquiries from a listener or viewer of said radio or television broadcast . . . ." (Ex. B, 19-20.) A consumer using the REELZ Schedule service may access the REELZ Schedule service website and inquire about, for example, the "Treasure King & Scream Queen" episode of the television show *Treasure King* broadcasted by REELZ.

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c. Claim 94 involves "creating a program description file . . . ." (Ex. B, 23:21.) The individual inquiring about the episode "Treasure King & Scream Queen" would learn from the REELZ Schedule service: "Richie tries to scare up an item from an iconic horror film. Will it be a dream come true - or turn into a nightmare?" http://www.reelz.com/reelztv/.

d. The method of claim 94 involves "communicating program list information into a programmed data processor . . . ." (Ex. B, 23:23-24.) The REELZ Schedule service user is able to learn about REELZ's *Treasure King* because REELZ has a programmed data processor that communicates the program information to the REELZ Schedule service.

e. Claim 94 involves "correlating said program descriptions of program material with said program list information and generating information in a database responsive to only a broadcast identifier . . . ." (Ex. B, 23:24-27.) REELZ correlates the communicated *Treasure King* program information with the broadcast of the *Treasure King* program.

f. Claim 94 involves "using said programmed data processor to communicate said program description file responsive to said user inquiry." The REELZ Schedule service communicates the *Treasure King* program information to the REELZ Schedule service user.

Count 3 – Infringement of U.S. Patent No. 7,574,721

13.   Global Interactive owns United States Patent 7,574,721 (the "'721 patent") (attached as Exhibit C).

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14.   REELZ is infringing at least one of the 35 methods and systems claimed in the '721 patent by providing the REELZ Schedule service.

15.   For example, and for illustration of one of the 35 claims of the '721 patent that Global Interactive alleges the REELZ Schedule service infringes, REELZ infringes claim 20 of the '721 patent as follows:

   a.   Claim 20 is "A method for identifying at least one broadcast provider over a network in response to at least one user communication, wherein the at least one user communication comprises at least one user related broadcast identifier that is not required to by itself identify the at least one broadcast provider, the method comprising: receiving at least one user related network address associated with at least one user communication; . . . ." (Ex. C, 19:17-24.) The REELZ Schedule service practices the method of claim 20 when it identifies REELZ as the broadcast provider of certain television programs and movies available to the user based on the user's time zone and in response to the "user related broadcast identifier," e.g., date for which the user wants to identify a broadcast provider of programming. For example, in response to a user's communication, REELZ is identified as the broadcast provider of the movie *Silence of the Lambs* on October 31, 2015 at 2:30 pm CST. www.reelz.com/reelztv/?date=10/31/2015&timezone=CT&showid=0.

   b.   Claim 20 involves "querying, by a processor, a database of one or more stored network addresses wherein each stored address or part thereof is indexed to one or more stored broadcast identifiers, wherein each of the

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stored broadcast identifiers is associated with at least one broadcast

provider . . . ." (Ex. C, 19:25-29.) The REELZ Schedule service queries a

database of stored zip codes indexed to broadcast identifiers, e.g., content

programming by date.

c. Claim 20 involves "determining whether the received at least one user

related network address matches at least one of the stored network

addresses or parts thereof . . . ." (Ex. C, 19:30-32.) The REELZ Schedule

service determines whether the user's zip code matches one of the stored

zip codes.

d. In Claim 20, "if at least one of said stored network addresses or parts

thereof matches the received at least one user related network address,

retrieving one or more indexed broadcast identifiers corresponding to the

at least one matching network address or part thereof . . . ." (Ex. C, 19:33-

37.) Once the REELZ Schedule service determines that the user's zip code

matches at least part of a stored zip code, the REELZ Schedule service

retrieves broadcast identifiers that identify the programming of REELZ

programs corresponding to the user's zip code.

e. Claim 20 involves "receiving said at least one user related broadcast

identifier associated with at least one user communication . . . ." (Ex. C,

19:38-39.) The REELZ Schedule service receives the user related

broadcast identifier identifying the date for which the user wants to

identify a broadcast provider of programming when the user selects a date.

    f.   Claim 20 involves "identifying, by the processor, at least one broadcast provider using both said retrieved indexed one or more broadcast identifiers and said received at least one user related broadcast identifier, wherein the identifying of the at least one broadcast provider does not require identifying only a closest proximity broadcast provider based on the received at least one network address." (Ex. C, 19:40-46.) The REELZ Schedule service, using, for example, the user related broadcast identifier of October 31, 2015, identifies REELZ as the broadcast provider of the movie *Silence of the Lambs* on October 31, 2015 at 2:30 pm CST. www.reelz.com/reelztv/?date=10/31/2015&timezone=CT&showid=0.

Prayer for Relief

WHEREFORE, Global Interactive prays for the following relief against REELZ:

(a)   Judgment that REELZ has directly infringed claims of the '907 patent, the '577 patent, and the '721 patent;

(b)   For a reasonable royalty;

(c)   For pre-judgment interest and post-judgment interest at the maximum rate allowed by law; and

(d)   For such other and further relief as the Court may deem just and proper.

Demand for Jury Trial

Global Interactive demands a trial by jury on all matters and issues triable by jury.

Date: <u>October 28, 2015</u>   Respectfully Submitted,

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